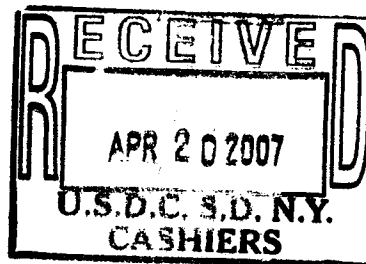


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Attorneys for Plaintiff, Klaussner International, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07 CV 3180

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KLAUSSNER INTERNATIONAL, LLC

Index No.

Plaintiff,

- against -

COMPLAINT

M.V. EASLINE TIANJIN, in rem; and YANG
MING MARINE TRANSPORT CORP.,

Defendants.

-----X

The plaintiff herein, by its attorneys, HILL RIVKINS & HAYDEN LLP, complaining of the above named vessel and defendants, alleges upon information and belief.

FIRST: This is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure.

SECOND: At and during all the times hereinafter mentioned, plaintiff had and now has the legal status and principal office and place of business stated in Schedule A hereto annexed and by this reference made a part hereof.

THIRD: At and during all the times hereinafter mentioned, the defendants have and now have the legal status and office and place of business stated in Schedule A, and were and

now are engaged in business as a common carriers of merchandise by water for hire.

FOURTH: On or about the date and at the port of shipment stated in Schedule A, there was delivered to the defendants in good order and condition the shipment described in Schedule A, which the said defendants received, accepted and agreed to transport for certain consideration to the port of destination stated in Schedule A.

FIFTH: Thereafter, the said shipment arrived at the port of destination described in Schedule A, and the cargo was either not delivered, or delivered in damaged condition.

SIXTH: By reason of the premises, the above named defendants breached, failed and violated their duties and obligations as a common carrier and was otherwise at fault.

SEVENTH: Plaintiff was the consignee of the shipment as described in Schedule A, and brings this action on its own behalf and, as agent and trust, on behalf of and for the interest of all parties who may be or become interested in the said shipment, as their respective interests may ultimately appear, and plaintiff is entitled to maintain this action.

EIGHTH: Plaintiff has duly performed all duties and obligations on its part to be performed.

NINTH: By reason of the premises, plaintiff has sustained damages as nearly as same can now be estimated, no part of which has been paid, although duly demanded, in the amount of \$42,000.

W H E R E F O R E, plaintiff prays:

1. That process in due form of law according to the practice of this Court may issue against the vessel and the defendant; and,
2. That if the defendant cannot be found within this District, that all of its properties

within this District, as shall be described in an affidavit, be attached in the sum set forth in this complaint, with interest and costs; and,

3. That a decree may be entered in favor of plaintiff against the defendants for the amount of plaintiff's damages, together with interest and costs; and,

4. Plaintiff further prays for such other, further and different relief as to this Court may seem just and proper in the premises.

Dated: New York, New York
April 20, 2007

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff

By: 

John Eric Olson (JO 4394)
45 Broadway
New York, New York 10006
(212) 669-0600

SCHEDULE A

Plaintiff's legal status and place of business:

Plaintiff, Klaussner International LLC, is a corporation having a principal place of business at 405 Lewallen Road, Asheboro, NC 27205.

Defendants' legal status and place of business:

Defendant, Easline Tianjin, in rem, is a vessel registered under the laws of Singapore.

Defendant, Yang Ming Marine Transport Corp. is a corporation or other business entity with a place of business c/o Yang Ming (America) Corp., 525 Washington Blvd., 25th Floor, Newport Office Tower, Jersey City, NJ 07310.

Date of Shipment: July 8, 2006

Port of Shipment: Xingang, China

Port of Discharge: Wilmington, NC

Place of Delivery: Robbins, NC

Shipper: Tianjin Master Home Furniture

Consignee: Klaussner International, LLC

B/L: YMLUE235003906

Notify: Rogers & Brown

Description of Shipment: Furniture

Nature of Loss or Damage: Physical Damage and non-delivery